

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM, P.A.

1125 Atlantic Avenue - Third Floor

Atlantic City, NJ 08401

(609) 344-3161

File No. 51154.22

Attorney for Defendant, Marina District Development Company, LLC d/b/a Borgata Hotel  
Casino & Spa

JOHAN DANIYAN,

: NO. 07-cv-02734 (JHR)(JS)

:

Plaintiff :

vs.

:

Civil Action

:

BORGATA HOTEL CASINO,

:

**MOTION IN LIMINE TO BAR**

:

**ANY TESTIMONY REGARDING**

Defendant. :

**ALLEGED MENTAL DISABILITY**

:

**OR COGNITIVE IMPAIRMENT**

TO: GREGORY N. FILOSA, ESQUIRE and MARY L. BEJARANO, ESQUIRE  
Attorneys for Plaintiff

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendant, Marina District  
Development Company, LLC d/b/a Borgata Hotel Casino & Spa, will apply to the above named  
Court on Monday, January 10, 2011 at 9:00 a.m., or as soon thereafter as counsel may be heard,  
for an Order to Bar any testimony regarding alleged mental disability or cognitive impairment.  
Reliance will be placed upon the attached Brief. A proposed form of Order is annexed.

COOPER LEVENSON APRIL  
NIEDELMAN & WAGENHEIM, P.A.

BY:

NANCY A. VALENTINO, ESQUIRE  
Attorney for Defendant, Marina District  
Development Company, LLC d/b/a Borgata  
Hotel Casino & Spa

DATED: JANUARY 3, 2011

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